

While I am a member of ARRL, their proposal as outlined in RM-11306 does not necessarily represent my viewpoint.

In order for regulation by bandwidth to be enforceable, a (calibrated) means of bandwidth measurement must be used. Lacking the measurement apparatus, bandwidth can only be inferred based on what is heard and perceived as the operating mode.

Therefore, in the limit the ARRL proposal defaults to regulation by mode, which exists under current FCC rules.

Improving regulation by offering maximum flexibility with minimum interference should be the goal for any changes to the current rules.